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MEMO ENDORSED

June 16, 2025

**VIA ELECTRONIC FILING**

Hon. Andrew L. Carter, Jr., USDJ  
United States District Court  
Southern District of New York  
40 Foley Square, Courtroom 444  
New York, New York 10007

**Re: Nwobi, Barbara v. Ryder Truck Rental, Inc.  
(Civil Action No. 1:25-cv-04894-ALC)**

Dear Judge Carter:

Constangy, Brooks, Smith & Prophete represents defendant Ryder Truck Rental, Inc. ("Ryder" or "Defendant") in the above-referenced matter. Pursuant to *Fed. R. Civ. P.* 7(b), *L. Civ. R.* 7.1(d), Sections 1(A) & (D) of Your Honor's Individual Practices, we respectfully request a two (2) week extension of time to file a responsive pleading.

In support of our request, we state the following:

1. A Notice of Removal was filed on June 10, 2025. Pursuant to *Fed. R. Civ. P.* 81(c)(1)(C), an Answer or dispositive motion is presently due on June 17, 2025.
2. No prior extension as to the responsive pleading deadline has been requested or granted.
3. Ms. Nwobi has graciously consented to the requested two (2) week extension and the Parties understand that a responsive pleading will be filed on July 1, 2025 if the requested extension is granted.
4. This request is made in good faith and has not been made for any improper purpose such as unnecessary delay or increase in the cost of litigation.
5. Plaintiff's Complaint includes eighty-five (85) pages of exhibits, which Plaintiff represents contain the factual allegations supporting causes of action for "Discrimination, Wrongful Termination And Retaliation took place against me by the Defendant Ryder Truck Sales Inc." [ECF No. 1-1].

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6. A brief extension of time is necessary to review the documents filed by Plaintiff before an Answer or responsive pleading can be submitted.

7. If the requested extension is granted, a responsive pleading will be due on July 1, 2025.

We thank the Court for its continuing attention to this matter.

Respectfully submitted,  
**Constangy, Brooks, Smith & Prophete, LLP**

/s/ Anjanette Cabrera  
Anjanette Cabrera  
Partner

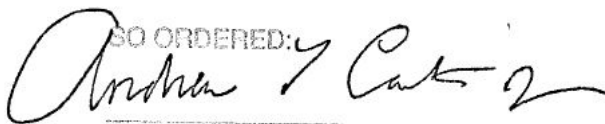
cc: Chambers of Hon. Andrew L. Carter, Jr., U.S.D.J., *Courtesy Copy via Email*  
(ALCarterNYSDChambers@nysd.uscourts.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that on June 16, 2025, I caused to be filed *via* ECF a true and correct copy of the foregoing request for an extension, which will affect electronic service on all parties. A true and correct copy of this document was also served on Plaintiff *via* email and First Class Mail as follows:

Barbara Nwobi, *pro se*  
P.O. Box 663  
Glen Wild, New York 12738  
Email: nwobi1962@hotmail.com

/s/ Anjanette Cabrera  
Anjanette Cabrera

SO ORDERED:  
  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE  
June 16, 2025  
New York, NY